

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
PORTLAND  
RECEIVED & FILED

2019 NOV -5 P 1:48

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
MICHAEL LIBERTY, et al. )  
 )  
Defendants )

Criminal No. 2:19-cr-00030-GZS

DEPUTY CLERK

**MOTION TO SEAL PLEADINGS**

The Government hereby respectfully requests that the Court seal the United States' Motion for Abrogation of Attorney-Client Privilege, together with the attachments thereto, until such time as, and to the extent that, the Court rules that the material therein is unprivileged and may be disclosed to the government's trial team and the public.

As set forth in the subject motion, the government is seeking a ruling from the Court that certain materials are not protected by the attorney-client privilege. This motion and the attachments were produced by a Department of Justice "filter team," separate from the assigned trial team attorneys, for the purpose of ensuring that the government's trial team is not exposed to any potentially privileged information prior to a ruling of the Court. The motion, together with its attachments, sets forth the materials and the basis for the government's motion in some detail.

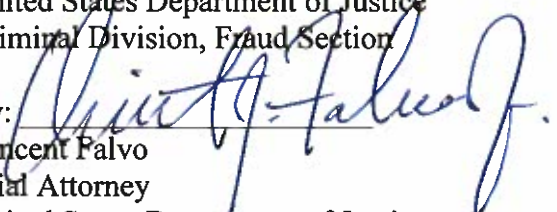
In light of this posture, and pursuant to Local Rule 157.6, the undersigned respectfully request that the Court seal the attached pleadings until such time as the Court rules the matters unprivileged, thereby avoiding any premature or inappropriate divulgence of this information to the trial team or the public.

After the Court's ruling on the government's motion to abrogate the attorney-client privilege, the government may seek an additional, limited motion to seal third party personal identifying information.

Date: November 4, 2019

Respectfully submitted,

ROBERT A. ZINK, Chief  
United States Department of Justice  
Criminal Division, Fraud Section

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**CERTIFICATE OF SERVICE & FILING**

I hereby certify that on November 4, 2019, I filed the foregoing motion to abrogate attorney-client privilege with the Clerk of the Court by overnight carrier, and I provided copy to by overnight carrier to the following:

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